UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

MEDIA PRODUCTS, INC.	
DBA DEVIL'S FILM)
9145 Owensmouth Ave.)
Chatsworth, CA 91311)
Plaintiff,)
V.) Civil Action 1:12-cv-00125-CM
DOES 1 – 59)
Defendants.)

MOTION FOR LEAVE TO TAKE DISCOVERY PRIOR TO RULE 26(f) CONFERENCE

Plaintiff, by and through counsel, pursuant to the Federal Rules of Civil Procedure, respectfully requests this Court for leave to take discovery prior to the Rule 26(f) conference, as explained the accompanying Memorandum of Points and Authorities, filed contemporaneously herewith. The reasons are that (1) the Defendants cannot be identified without information from their respective Internet Service Providers (ISPs), and (2) such ISPs have limited retention periods for the relevant records.

Respectfully submitted this 10th day of January, 2012.

FOR THE PLAINTIFF:

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